

COHEN & GREEN

November 1, 2024

Hon. Valerie E. Caproni, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

By Electronic Filing.

Re: Thorn Lawless v. City of New York, et al., 23-cv-09106 (VEC)

Dear Judge Caproni:

My firm, with co-counsel, represents Plaintiff in the case above. I am pleased to report that the parties have reached an agreement in principle on attorneys' fees required under 42 U.S.C. § 1988 and the judgment entered on September 4, 2024 (ECF No. 29).

The parties reached that agreement yesterday. Given that, I write to ask — with Defendants' consent — for a brief, 30 day extension under Rule 54(d)(2)(B)(i), with the plan that no application would actually be filed, and the time will be used to simply finalize standard paperwork. We are hopeful paperwork will be done and filed well before 30 days expire.

Per the Court's rules, (1) the reason and (2) prior deadlines are above, (3) this is the second request for an extension of this deadline, (4) all parties consent, and (5) Plaintiff proposes a new deadline of November 5, 2024.

As noted above, we hope we are able to file final paperwork within a few business days that will moot the deadline anyway.

As always, the parties thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff

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Application GRANTED. Plaintiff's deadline to move for attorneys' fees is extended to **Thursday, December 5, 2024**.

SO ORDERED.



11/4/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE